

DLA PIPER LLP (US)
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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	:	Chapter 11
	:	
In re:	:	Case No. 14-12831 (smb)
	:	
RENA LANGE (USA), INC.,	:	Chapter 11
ADBA Mabrun; ADBA St. Emile,	:	
ADBA Gloriette,	:	
	:	
Debtor.	:	
	:	

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby enters an appearance on behalf of Thor ASB 875 Washington Street LLC, a creditor and/or party in interest in the above case, and, pursuant to 11 U.S.C. §§ 342(a) and 1109(b), Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010(b) and the Local Rules of this Court, hereby requests that all notices given or required to be given and all papers served or required to be served be served on the following:

Daniel G. Egan
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code provisions and Bankruptcy Rules specified above, but also includes, without limitation, all notices and/or orders relating to any application, motion, petition, pleading, request, complaint or demand, whether transmitted or conveyed by mail, delivery, telephone, telecopy or otherwise, which may in any way affect or seek to affect any right or interest of Thor ASB 875 Washington Street LLC.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 3017, the foregoing request includes any disclosure statement and/or plan of reorganization filed in this case.

PLEASE TAKE FURTHER NOTICE that the filing of this pleading is intended to constitute only a special appearance to the extent that a general appearance would constitute a waiver of any right. The filing of this pleading is not intended to be, nor shall it be deemed, a consent to or waiver of the right to challenge the jurisdiction of the United States Bankruptcy Court to adjudicate any matter, including, without limitation, any non-core matter, which right is hereby expressly reserved. Furthermore, the filing of this pleading is not intended to be, nor shall it be deemed, a consent to or waiver of any right to a jury trial, should such right be available at any time during the course of this proceeding, which right is hereby expressly reserved.

DATE: October 16, 2014

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Daniel G. Egan
Daniel G. Egan (Bar No. NY-4644191)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of October, 2014, a copy of the foregoing Notice of Appearance and Request for Notice and Service of Papers was sent by electronic mail via ECF and first class-mail postage prepaid to:

Wayne M. Greenwald
Wayne M. Greenwald, PC
475 Park Avenue South, 26th Floor
New York, NY 10016

/s/ Daniel G. Egan

Daniel G. Egan